

EXHIBIT C

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October 26, 2021

VIA ELECTRONIC MAIL

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Hunton Andrews Kurth LLP
333 SE 2nd Ave.
Miami, FL 33131

Re: *Continental Casualty Co. v. AWP USA Inc. a/k/a Aga Inc.*, No. 3:19-cv-00661 (E.D. Va.)

Dear Counsel:

On behalf of Continental Casualty Company ("Continental"), we write to address the status of Defendants' production of documents responsive to Continental's First Set of Requests for Production of Documents to Defendants (the "Requests"). The Requests were served on August 13, 2021. Defendants responded to the Requests on September 13, 2021, agreeing to produce certain responsive documents. Defendants also advised that they intended to produce documents on a rolling basis. However now, over two months after Continental served the Requests and over a month after Defendants' served their responses, Defendants have yet to produce a single document.

Continental has identified numerous deficiencies in Defendants' objections and responses to the Requests, including in my September 2, 2021 and September 27, 2021 letters and on our meet and confer call on September 29, 2021. Based on our September 29 call, Continental understands that it will be necessary to seek judicial intervention with respect to certain disagreements that the parties are unable to resolve. However, Continental cannot fully evaluate the scope of issues with respect to which it must seek judicial intervention until it reviews Defendants' production and privilege log.

Discovery is set to close on February 25, 2022, with dispositive motions due shortly after that date on March 9, 2022. Before that time, the parties will need to seek, obtain, and implement a judicial resolution of the discovery disputes. In addition, all depositions and any expert discovery must occur during this time.

Even more imminently, the parties have scheduled a mandatory settlement conference on December 6, 2021. When we discussed the timing for scheduling the conference, we made clear that it would be futile to continue settlement discussions without discovery.

Please advise no later than close of business Thursday, October 28 when Continental can expect to receive Defendants' initial production and confirm that Defendants will produce all responsive documents no later than November 15, 2021.

Michael S. Levine, Esq.
Cary D. Steklof, Esq.
October 26, 2021
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Very truly yours,

WILEY REIN LLP

A handwritten signature in blue ink, appearing to read "Mary E. Borja", with a stylized flourish at the end.

Richard A. Simpson
Mary E. Borja